



FEDERAL ELECTION COMMISSION
Washington, DC 20463

VIA ELECTRONIC AND FIRST CLASS MAIL

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APR 10 2018

Renata Strause, Esq.
Workers' Voice
815 16th Street N.W.
Washington, D.C. 20006
RStrause@afcio.org

RE: MUR 7285
Worker's Voice and Elizabeth Shuler
in her official capacity as treasurer

Dear Mr. Gold and Ms. Strause:

On April 4, 2018, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 52 U.S.C. § 30104(g)(1), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") and 11 C.F.R. § 104.4(b) and (c) of the Commission regulations. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1618.

Sincerely,

Timothy D. Hart

Kimberly D. Hart
Attorney

Enclosure
Conciliation Agreement

1804441424

1 **BEFORE THE FEDERAL ELECTION COMMISSION**

2
3 In the Matter of)

4 Workers' Voice and Elizabeth Shuler)
in her official capacity as treasurer)

MUR 7285)

5 **CONCILIATION AGREEMENT**

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7 This matter was initiated pursuant to information ascertained by the Federal Election
8 Commission (the "Commission") in the normal course of carrying out its supervisory
9 responsibilities. The Commission found reason to believe that Workers' Voice and Elizabeth
10 Shuler in her official capacity as treasurer (together, "Respondent" or "Committee") violated
11 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(b) and (c).

12 NOW, THEREFORE, the Commission and the Respondent, having participated in
13 informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree
14 as follows:

15 I. The Commission has jurisdiction over the Respondent and the subject matter of
16 this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C.
17 § 30109(a)(4)(A)(i) (formerly 2 U.S.C. § 437g(a)(4)(A)(i)).

18 II. Respondent has had a reasonable opportunity to demonstrate that no action should
19 be taken in this matter.

20 III. Respondent enters voluntarily into this agreement with the Commission.

21 IV. The pertinent facts in this matter are as follows:

22 1. The Committee is a federal non-connected independent expenditure only political
23 committee. Elizabeth Shuler is the Committee's treasurer of record.

24 2. The Federal Election Campaign Act (the "Act") requires committee treasurers to

1 file reports of receipts and disbursements in accordance with the provisions of 52 U.S.C

2 § 30104(b).¹ This requirement includes reporting contributions received and independent
3 expenditures made by political committees other than authorized committees.²

4 3. Further, political committees that make or contract to make independent
5 expenditures aggregating \$10,000 or more with respect to a given election any time during the
6 calendar year – up to and including the 20th day before an election – must disclose the activity
7 within 48 hours following the date of public distribution or dissemination.³ In addition, political
8 committees must file additional reports within 48 hours after each time they make or contract to
9 make independent expenditures aggregating an additional \$10,000 related to the same election.⁴
10 Political committees that make or contract to make independent expenditures aggregating \$1,000
11 or more with respect to a given election after the 20th day, but more than 24 hours, before the
12 date of that election, must disclose them within 24 hours following the date of dissemination.⁵ In
13 addition, political committees must file additional reports within 24 hours after each time they
14 make or contract to make independent expenditures aggregating an additional \$1,000 related to
15 the same election.⁶

16 4. The Commission found reason to believe that the Committee failed to timely file
17 one hundred eighteen (118) 24- and 48-Hour reports to support one thousand nine hundred

¹ 52 U.S.C. § 30104(a)(1).

² 52 U.S.C. §§ 30104(b)(2)(A) and (D), (4)(H)(iii); 11 C.F.R. §§ 104.3(a)(2)(i) and (ii), (b)(1)(vii), 104.4(a).

³ 52 U.S.C. § 30104(g)(2)(A); 11 C.F.R. § 104.4(b)(2).

⁴ 52 U.S.C. § 30104(g)(2)(B); 11 C.F.R. § 104.4(b)(2).

⁵ 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c).

⁶ 11 C.F.R. § 104.4(c).

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IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties resolving the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

BY:

Kathleen Guith
Kathleen Guith
Associate General Counsel
for Enforcement

4/6/18
Date

FOR THE RESPONDENT:

BY:

Laurence E. Gold
Laurence E. Gold
Co-Counsel for Respondent

Date

3/19/18

Renata Strause
Renata Strause
Co-Counsel for Respondent

Date

3/19/18